

I oppose the waiver requested by ReconRobotics for use of the 430-448 MHz frequency band. This band is heavily used by amateur radio (on a secondary allocation), in many cases in support of emergency services activities.

"During an emergency" is exactly the wrong time to have a source of interference appear on the input frequency of a repeater being used to support emergency services. "During an emergency" is exactly the wrong time for limited amateur radio operator time and energy to be spent tracking down interference from a transient user, whether that interference is to a repeater or a simplex voice channel.

The petitioner's claim that 1W is unlikely to cause interference is patently absurd. From my home, using 1W on a handheld radio, I can activate not only the local repeater which bears my callsign as trustee, but a linked system of repeaters covering the entire western half of the state of Oregon. My repeater is maintained and funded by the local ARES (Amateur Radio Emergency Services) group for use in emergencies. I, and many other local residents, would not be pleased to find it made unusable because a commercial operation decided to set up on its input frequency.

Besides voice repeater operations in 440-450MHz, the 430-440MHz range is used for both data and voice linking of repeaters and packet radio systems. This commercial system, in the wrong place at the wrong time, could prohibit communications vital to public safety. For example, during the recent storms in northwest Oregon, packet radio was a critical link between local government and the state Office of Emergency Management. The local links are typically VHF, but the links connecting them all are primarily UHF. This link was seen as critical enough that the governor of the state of Oregon has ordered OEM to provide \$250,000 in equipment support for expanding this digital network.

Further, as these robots will be used by law enforcement and firefighting agencies, they should be licensed within the frequency spectrum already allocated for those agencies. There are a large number of commercial and public safety allocations above 450MHz. The difference in propagation between 430-448MHz and 450-470MHz is miniscule and there are no technical reasons why the already allocated spectrum would not

suffice. If used by federal agencies, the existing spectrum below 430MHz is more than sufficient.

Unlike the just mentioned commercial/public safety allocations where every user is licensed and coordinated for specific frequencies, the amateur radio services are licensed for any frequency within the band. There is no federal database of "occupied" amateur radio frequencies which the petitioner can refer to to find open space. While there are lists of repeaters, and many links are coordinated, the remainder of the spectrum is available on a non-interfering basis. What may be a silent frequency today may be the prearranged frequency for emergency service operations tomorrow.

If, as the claimant states, the power level is insufficient to cause interference to the users of 430-448MHz, then certainly it is insufficient to cause interference to the users of 450-470MHz or below 430MHz. Additionally, by following the established coordination procedures for commercial spectrum, the claimant can help ensure a lack of interference, whereas his uncoordinated use of amateur radio spectrum will only create interference.

Amateur use of this spectrum has been limited due to interference complaints from the US Air Force in the operation of their PAVE PAWS radar system. It is unreasonable to throw yet another user into the same frequencies that are known to cause problems for the primary allocation. Because of its classified nature, we cannot be told specifically the area(s) or frequencies that cause interference, only that specific operations must either cease or be so limited in power that they are effectively silenced. Allowing an itinerant user free access to these same frequencies would be nonsensical.

And finally, the interference issue is not a one-way street. If this commercial operator is allowed to use amateur radio frequencies on a non-interfering basis, then he is subject to interference from our operations. During HIS emergency is exactly the wrong time for his robot to stop functioning because I'm using my radio. Many of my radios produce much more than 1W.

The FCC has recently denied a petition for the use of amateur radio

spectrum for a commercial automobile race operator. It should do the same for this petition. Existing allocations are more than adequate, and mandatory coordination is necessary.

Thank you.

John Stanley